

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FOXMIND CANADA ENTERPRISES LTD.,

Plaintiff,

v.

ABCTEC, et al.,

Defendants.

CASE NO. Case 1:21-cv-05146-KPF

**DECLARATION OF ZHEN PAN IN SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL FOR CERTAIN DEFENDANTS**

I, Zhen Pan, declare as follows:

1. My name is Zhen Pan. I am over eighteen (18) years of age and fully competent to execute this declaration. The facts set forth herein are within my personal knowledge.

2. I am an attorney at the law firm of Diaz, Reus & Targ LLP (“DRT”), and my business address is 100 SE 2nd Street, Suite 3400, Miami, Florida, 33131.

3. This Declaration is submitted in support of DRT’s Motion to Withdraw as Counsel for Defendants (1) Beijiang-Zs, (2) Callenbach, (3) Cindbest, (4) Conqload, (5) Endless-US, (6) Guo Xiao Yan, (7) Hongpu-AA, (8) Johnson’s Home, (9) Kongjiandianzishangwu, (10) Newpeppr, (11) Oniisee Store, (12) Priamaa, (13) Run Duck, (14) Sharlovy-US Direct, (15) Songguodong (16) Sweat2020, (17) Ulove Best, (18) Xibaopeng, (19) Yalaidir, (20) Ycl-US, (21) Zhangyaowu, and (22) Zhongsi-US (collectively “Defendants”).

4. Irreconcilable differences have arisen between DRT and Defendants as to litigation strategy, such as to render it impossible for DRT to continue to effectively represent Defendants.

5. Defendants have instructed the undersigned to withdraw.

6. DRT is not going to assert a retaining or charging lien as to Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 26, 2022

/s/Zhen Pan
Zhen Pan